



The Honorable Chuck Hagel
Edmund A. Walsh School of Foreign Service
Georgetown University
37th and O Street, NW
Washington, DC 20057

CHAIRMAN
CHUCK HAGEL

**CHAIRMAN INTERNATIONAL
ADVISORY BOARD**
BRENT SCOWCROFT

PRESIDENT AND CEO
FREDERICK KEMPE

February 8, 2013

Dear Senator Hagel,

I write in response to your letter to me, dated February 7, 2013, in which you ask whether the Atlantic Council can provide the U.S. Senate information regarding your remuneration as our chairman and foreign funding to the Council.

I confirm that your service to the Atlantic Council as its chairman since February 2009 has been on a pro bono basis. Therefore, in response to the Senators' specific questions, I can confirm that you have never been paid by the Council for your service as chairman directly or indirectly with foreign funds. (Aside from some travel expenses, you received compensation only once during your four years at the Atlantic Council of \$5,000 as an honorarium in 2012 for writing a paper for a project called "the Task Ahead," consistent with the amounts paid other authors, and paid from general Council resources and not a foreign source.)

With regard to all donors, the Council maintains clear policies to ensure its ethical and legal operation as a section 501(c)(3) organization which values its credibility and integrity as a generator of creative ideas. All potential contributions from foreign governments or foreign government entities are vetted and approved by the Nominating and Governance Committee of the Atlantic Council Board of Directors. All agreements with donors stipulate that the Council retains intellectual independence and control over any content. Attached for your reference (at Tabs A and B) are the Council's Foreign Government Funding Review Process and the Council's Intellectual Independence Policy.

The Council, as a section 501(c)(3) organization, does not make public a comprehensive list of all its donors. However, we do publicly acknowledge our corporate donors of \$5,000 and more. Attached at Tab C is a list of foreign corporate donors to the Council over the past five years. Consistent with our policy with regard to foreign government funding, we also disclose foreign government donors. Attached at Tab D is a list of foreign government donors or foreign government-controlled entities which have donated to the Council over the past five years.

Please do not hesitate to let us know if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Frederick Kempe".

Frederick Kempe
President and CEO
Atlantic Council

- Tab A: Atlantic Council Foreign Government Funding Review Process
- Tab B: Atlantic Council Intellectual Independence Policy
- Tab C: Foreign Corporate Donors to the Atlantic Council (past five years)
- Tab D: Foreign Government Donors to the Atlantic Council (past five years)



Foreign Government Funding Review Process

The Council enjoys a diversified donor base helping to ensure our credibility and integrity. As we grow, we increasingly are engaging foreign governments which are interested in supporting programming at the Council. To protect our independence and reputation, we have established a process to obtain authorization to negotiate financing with a foreign government or state-controlled entity. The Governance Committee of the board of directors formally approved this process.

Attached is a template that sets out the process Council programs must complete to ensure a thorough review and formal approval of proposed foreign government funding prior to the Council entering formal negotiations for such a gift or contract. Programs should coordinate in advance with the CEO, Executive Vice President, and Vice President of Advancement on any potential exploratory talks with official foreign partners; however, we need to seek formal board authorization once we have an expectation of credible interest on our part and our foreign partner for a potential project. In such cases, program directors should submit this completed form for approval and board review.

Foreign Government Funding Review Process: [NAME OF COUNTRY]

Purpose: To obtain approval of potential funding from the government [and/or state-controlled entities] of [COUNTRY].

Context: Provide context of Council programming related to this country, region, or set of issues to be funded. Explain how this work would fit into the Council's mission and the program or center's established work. Specify how this funding would further the Council's profile on a set of issues for which the Council is known, or whether this funding would help the Council stake out new areas of work.

Description of Proposed Project

Provide a description of the proposed project including substantive focus, desired impact, events, timeframe, locations, audience, outputs, and related publications.

Unique Factors

If applicable, describe unique factors about the country, its transatlantic relationship, and any strategic context that merit consideration when deciding on whether to accept funding.

Rationale

- Provide succinct bullets summarizing the rationale for accepting these funds and implementing this project.

Ethics

- **Disclosure:** The Council maintains a consistent disclosure policy and will acknowledge that funding is from the government [and/or state owned entities] of [COUNTRY].
- **Intellectual Ownership:** The Council requires all sponsors to agree to the Council maintaining intellectual ownership of any products resulting from the project.
- **Multiple Funding Sources:** When possible, the Council works to ensure that any one project is not dependent on one government funder. [In this case, the Council will seek additional funding from other sponsors such as...].
- **Topics:** Describe how the topic(s) of the project expand the Council's focus beyond any potential specific agenda of the donor.
- **Diversity:** Describe how the project may take into account a range of views and participants.

Funding: Specify the range of funding sought and the specific government entities that might provide the funding.

Recommendation: That Council management be authorized to negotiate with [COUNTRY] authorities on the financing of [this/these proposed project/s].

Atlantic Council Policy on Intellectual Independence

The Atlantic Council is a nonpartisan organization that generates ideas and fosters debate on policy issues facing the Atlantic community. Its directors, staff, members, and contributing authors represent a diverse community united by a common belief in the Council's mission of renewing the Atlantic community for global challenges. The Council promotes constructive leadership and engagement in international affairs based on the central role of the Atlantic community meeting the global challenges of the 21st century.

The Atlantic Council embodies a nonpartisan network of leaders who:

- recognize that closer transatlantic cooperation cannot solve all global challenges, but it is often a precondition for dealing with them effectively;
- are committed to ensuring the Atlantic community remains a powerful catalyst for global cooperation and a cornerstone of US engagement in the world; and
- believe that today's most pressing challenges can most effectively be addressed by bipartisan and multinational solutions.

The Council as an organization does not adopt or advocate positions on particular matters. The Council's publications, including reports, issue briefs, blog posts, etc., always represent the views of the author or authors rather than those of the Council. Each task force report, for example, specifies the degree to which members of the task force agree with the views represented in the report.

The Council maintains strict intellectual independence for all of its projects and publications. Council staff and directors, and those the Council engages to work on specific projects, are responsible for generating and communicating intellectual content resulting from Council projects. The Council requires all funders and donors to agree to the Council maintaining independent control of the content and conclusions of any products resulting from sponsored projects.

Council staff and others working on Council projects should be mindful that accuracy, forthrightness, and dignity befit association with the Atlantic Council, and that the public may judge the Council by the individual's conduct and statements. Therefore, when speaking, writing, or acting on behalf of the Council, Council staff should be accurate, exercise appropriate restraint, and show respect for the opinions of others. The Council's directors, staff, fellows, and members are encouraged to offer their own views on current policy issues as Council experts, but without implying Council endorsement of those views. When writing in external publications, posting to social media, and speaking to media on issues related to their work, Council staff are free to identify themselves as affiliated with the Council, but should make clear that their views represent their personal opinions, not

Council positions. External publications by staff members are not subject to Council editorial review. Similarly, Council staff members are free to adopt political positions, endorse candidates, and sign petitions in their personal capacities, but must follow the guidelines specified in the Atlantic Council Policy on Election-Related Activity.

Council staff are encouraged to engage in external substantive activities that reinforce their programs and the Council's mission. When signing off on products of these efforts, including public letters, statements, task force reports, etc., Council staff should endeavor to make clear that they are signing in a personal capacity rather than representing the views of the Council as a whole. Consistent with the Council's commitment to transparency, Council staff members who intend to affiliate themselves with such public documents addressing policy matters should inform the president and executive vice president in advance.

Foreign Corporate Donors
which have provided funding to the Atlantic Council in the past five years

Foreign Corporate Funding

ACE Group	Globis	PublicisLive
AES Enerji Ltd.	Grundfos	QinetiQ
Afren	Grupo Espirito Santo	Risk Engineering Ltd
African Rainbow Minerals	Haviland Partners	Rolls-Royce
Ağaoğlu Holding	HCL Technologies Ltd	Royal Bank of Canada
Akfel Group	Ihlas Holding	Royal Bank of Scotland
All Nippon Airways	IMAX Corporation	Rubenius
Areva	Infosys	SNGN Romgaz SA
ARTOC Group	Istanbul Chamber of Commerce	Saab Group
BAE Systems	Istanbul Stock Exchange	Setgaz
Barclays Capital	JSC People's Bank of Georgia	Severstal
BBVA	KAR	The Shell Company
BP	Khaled Juffali Company	Soitec
Bromak EOOD	Krauss-Maffei Wegmann	Sony Corporation
C Faktoring AS	Kreab Gavin Anderson	Swiss Re
Calik Enerji	Worldwide AB	Thales Group
The Central Bottling Company	Lucky Cement	TOBB
Corporate Commercial Bank	MCB Bank Limited	Toyota Motor Corporation
Credit Suisse	Merck Finck & Co	Trans Adriatic Pipeline
Daimler AG	Millicom International	Transelectrica
Delta Petrol Urunleri Ticaret AS	Cellular SA	Transgaz Magistrala Energiei
Deutsche Bank AG	Mitsubishi Corporation	Trust Corporation
DNO International	Monitise	Türkerler
Dornier Seawings AG	Mytilineos Holdings SA	Turkish Airlines
DP Holding SA	Nabucco	TÜSIAD
EADS	Nestle, SA	UBS
Edison SpA	Newsdesk Media Group	Unicredit Group
Elsevier	Nikitas Brokerage Limited	Unilever
Empordef	Novartis	Wingate Capital SA
Enerjisa	NuclearElectrica	WPP Group PLC
Eni	The Olayan Group	Yüksel Insaat AŞ
First Eastern Investment Group	Oil Terminal SA	Zorlu Energy
Genel Enerji	OMV	Zurich
Georgian Industrial Group Holding	Polish Telecom	
	Poongsan Corporation	
	Portugal Telecom	
	PS Wind Management	

Foreign Government or Foreign Government Entity Donors
which have provided funding to the Atlantic Council in the past five years

Foreign Government Entity Funding

State Oil Company of Azerbaijan (SOCAR)
DEPA Public Gas Corporation (Greece)
JP Transnafta (Serbia)
Petroleum Pipeline Corporation (BOTAS) (Turkey)
Istanbul Natural Gas Distribution Co. (IGDAS) (Turkey)
Turkey Army College
The Electricity Generation Company (EUAS) (Turkey)
Turkish Petroleum Corporation (TPAO) (Turkey)

Foreign Government Funding

Kingdom of Bahrain
European Commission
Republic of Finland
Georgia
Republic of Kazakhstan
Grand Duchy of Luxembourg
Montenegro
North Atlantic Treaty Organization
Kingdom of Norway
Republic of Poland
State of Qatar
Kingdom of Saudi Arabia
Kingdom of Sweden
Republic of China (Taiwan)
United Arab Emirates
United Kingdom of Great Britain and Northern Ireland

- The Council has also benefitted from modest, in-kind contributions from foreign governments, for example when they have hosted Council events at their embassies.